

II. Remarks

Reconsideration and allowance of the subject application are respectfully requested.

Claims 1-5, 11, and 13-35 are pending in the application. Claims 1, 19, and 29 are independent.

The undersigned would like to thank Examiner Yang for the cordial and productive interview of December 10, 2009. The Examiner's helpful comments and suggestions were instrumental in preparing this response.

As discussed at the interview, Applicants have added new dependent Claims 30-35 to afford themselves a scope of protection commensurate with the disclosure. The new claims are fully supported in the specification (see for example paragraph [0058] and Fig. 6A of the published application), and are believed to be allowable for the reasons to be developed below.

As also discussed at the interview, Applicants reiterate their arguments that none of the art of record in the case (taken individually or in combination) discloses or suggests the claimed combinations of features including, inter alia, wherein the video capture system determines a *range* of color values corresponding to the selected pixel object, and then the pixel object tracking system tracks the selected pixel object through a plurality of the sequence of video frames based on the determined *range* of color values. As discussed, the

range of color values enables objects to be successfully tracked from frame-to-frame even if the object changes color slightly, as when moving from sunshine into shade. Such features are nowhere disclosed or suggested by Wistendahl '136, Sabat, and Toklu.

At the interview, Applicants' representative discussed U.S. Patent No. 6,198,833 (Rangan), which is of record in this case, but has been used by Examiner Chow (GAU 2628) in rejecting claims in co-pending Application No. 10/219,175. The Examiner's attention is respectfully directed to the prosecution details in that case. As discussed at the interview, Rangan discloses interactive video with object tracking. Applicants point out that Rangan discloses at Col. 2, lines 38-54:

(a) centering a tracking element on the entity in a first frame of a video display comprising a series of bitmapped frames, generating a matrix of signature pixels relative to the tracking entity, and initiating a tracking process; (b) recording the color values of each of the signature pixels in the first frame, creating thereby a color signature for the entity; (c) obtaining a next frame of the video presentation; (d) assuming a position for the entity in the next frame; (e) testing the color signature at the assumed position and at a plurality of test positions in the immediate vicinity of the assumed position against the color signature recorded for the entity; (f) accepting the position with the closest match to the color signature for the entity as the correct position for the entity; and (g) repeating steps (c) through

(f) to determine positions for the entity in
succeeding frames of the video presentation.

The Examiner's attention is also respectfully directed to Rangan: Col. 7, line 7 through Col. 8, line 52; Col. 9, lines 11-29; and Col. 11, lines 42-67.

As discussed at the interview, Applicants respectfully submit that Rangan fails to disclose the frame-to-frame tracking of selected objects based on the determined **color value range** of the selected pixel object, as recited in the claims of the subject application. While pixel color values are determined and stored in Rangan, there is no disclosure of determining any **color value range**. Accordingly, Applicants respectfully submit that the claims of the subject application are fully patentable over all of the art cited in this application.

As also discussed at the interview, Applicants have added new dependent Claims 30-35, which recite certain details of how Applicants determine the color value ranges which are used to track the selected pixel objects from frame-to-frame. These detailed claimed features are nowhere disclosed or suggested by any of the art of record in the application.

In view of the above, it is believed that this application is now in condition for allowance, and a Notice thereof is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 625-3507. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

/Richard P. Bauer/
Attorney for Applicants
Richard P. Bauer
Registration No. 31,588

PATENT ADMINISTRATOR
KATTEN MUCHIN ROSENMAN LLP
2900 K Street, N.W.
Suite 200
Washington, D.C. 20007-5118